



November 18, 2014

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MB Docket No. 12-83

Dear Ms. Dortch:

On Friday, November 14, 2014, I met with Maria Kirby, Legal Advisor to Chairman Wheeler for Media, Consumer and Governmental Affairs, and Enforcement to discuss the position of the National Association of Broadcasters ("NAB") in the above-referenced proceeding.

During the meeting, I expressed NAB's view that the advent of online video distributors ("OVDs") presents an exciting opportunity for local television broadcasters and other content providers by offering them another means to reach potential viewers. OVDs also can bring needed competition and consumer choice to the existing multichannel video programming distributor ("MVPD") market.

For the public to reap the full benefits of this opportunity, NAB believes that the Commission must consider how best to foster growth of OVDs, and how its actions concerning OVDs and MVPDs can promote, rather than diminish, localism. Among other things,¹ OVDs must limit the geographic scope of their offerings consistent with the scope of the retransmission consent and other rights they may negotiate in the marketplace, and the Commission's exclusivity rules. NAB is looking forward to working with FCC staff on the many complex issues in this proceeding to ensure that

¹ See, e.g., NAB Reply Comments in MB Docket No. 12-83 (June 13, 2012); NAB Comments in MB Docket No. 12-83 at 4-7 (May 12, 2012) (discussing the importance of ensuring regulatory parity among MVPD services, including applying signal carriage and program exclusivity requirements to OVDs).

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the FCC produces the best possible outcome that is also faithful to the Communications Act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "ERL Dozier", with a stylized, cursive script.

Erin L. Dozier
Senior Vice President and Deputy General Counsel
Legal and Regulatory Affairs

cc: Maria Kirby